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## **MEMO ENDORSED**

THE CITY OF NEW YORK
LAW DEPARTMENT

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December 9, 2019

## **BY ECF**

JAMES E. JOHNSON

Corporation Counsel

Honorable Valerie E. Caproni United States District Judge United States District Court Southern District of New York Thurgood Marshall U.S. Courthouse 40 Foley Square, Room 240 New York, New York 10007

Re: Belle, et al., v. the City of New York, et al.

19-CV-2673 (VEC)

Your Honor:

Application GRANTED.

SO ORDERED.

Date: 12/09/2019

HON. VALERIE CAPRONI UNITED STATES DISTRICT JUDGE

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, representing defendant City of New York in the above-referenced matter. Defendant City of New York writes respectfully pursuant to the Court's December 3, 2019 Order to request an extension of time to file an additional status report until December 13, 2019. Plaintiffs' counsel consent to this request, which is the first of such request.

On December 2, 2019, the parties filed a joint status letter in accordance with the Court's June 21, 2019 Order. (See ECF No. 26) The parties noted in the letter that this Office is still in the process of ascertaining information regarding the various NYPD databases, as well as any records related to plaintiffs' alleged warrant checks. (See id.) Accordingly, the parties proposed to file an additional status report by today, which Your Honor granted. (See ECF No. 27) Notwithstanding, our office needs additional time to confer with members of the NYPD with first-hand knowledge of NYPD databases and their capabilities, as well as the audit checks conducted for any records related to plaintiffs' claims. Accordingly, defendant City of New York respectfully requests an extension of time until December 13, 2019 to file an additional status update.

Thank you for your consideration herein.

Respectfully submitted,

Stephanie Michelle Vilella Alonso Assistant Corporation Counsel

cc: **BY ECF** 

George Fuad Farah, Matthew Keith Handley, and Cyrus Joubin *Attorneys for plaintiffs*